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September 11, 2019

The Honorable Frederic Block  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States v. Ruslan Mirvis*, 17 Cr. 273 (FB)

Dear Judge Block:

Michael Hueston and I represent Ruslan Mirvis in the above-referenced matter. We write respectfully to ask the Court to adjourn the status conference currently scheduled for September 13, 2019 by approximately 60 days, to a date and time convenient for the Court, and to exclude time between the two dates. The government does not object to the requested adjournment.

As the Court is aware, Mr. Mirvis is indicted with charges that carry mandatory minimum sentences of 15 and five years. With the help of several experts, the defense team has been working hard to obtain and coordinate mitigation materials. These materials address matters relating to Mr. Mirvis' personal and family history, mental and physical health, the particular risks posed by incarceration, and the immigration consequences of conviction.

While we have made significant progress, the requested adjournment is necessary to finalize and present our information to the government. We confirmed with one expert yesterday that he will need several additional weeks to conclude his work. In addition to the ordinary challenges of coordinating such materials, Mr. Mirvis' mother is presently undergoing treatment for cancer and is very unwell; Mr. Mirvis' family understandably has been limited in their ability to participate in the mitigation process.

To allow for continued discussion between the parties, we respectfully ask the Court to adjourn the status conference by approximately 60 days to a date and time convenient for the Court, and to exclude time between September 13, 2019 and the adjourned-to date.

Respectfully submitted,

/s/ Dorea Silverman

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Michael Hueston  
Dorea Silverman  
*Attorneys for Ruslan Mirvis*

cc: AUSA Drew Rolle